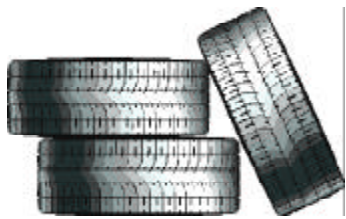


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# Expecting Inspections: Improving Garage Operations

U.S. Environmental Protection Agency

## The Issue

Environmental regulatory inspectors consider housekeeping, or general cleanliness and organization, when evaluating a facility's compliance with state and federal regulations. A regulatory inspector will scan a facility upon entry. The level of scrutiny the inspector gives to the rest of the facility may very well be based upon this "first impression." A clean and orderly facility makes a much more favorable impression during an inspection than one which is in disarray. In addition, maintaining an orderly facility will reduce the potential for injuries to personnel, allow for smoother maintenance operations, and will make the facility more visually appealing to the public – especially your neighbors.

## Facility Storage Yard

The first view of a highway facility seen by a regulatory inspector is usually the yard, where the inspector first arrives at the facility. It is therefore imperative that the facility yard be kept orderly. Raw materials should be arranged neatly and stored so they are identifiable as usable material rather than solid waste. This may include stacking materials (brick, piping, guard rails, etc.) and storing sand, gravel, asphalt, and other bulk materials within bermed storage bins fabricated from timbers, jersey barriers, guard rails, or other available materials.

Road salt should be stored on an impervious surface, in salt sheds or otherwise completely covered with a waterproof tarp. Make sure any residual salt is swept up off the ground and placed into the storage unit after storm events or following salt deliveries. Place a berm around exposed sand piles to prevent erosion and subsequent siltation of wetlands, catch basins, or surface waters.

If solid wastes are stored temporarily at the facility, they should be segregated by waste category, using jersey barriers, guard rails, or other means to divide the waste piles. This practice will avoid problems associated with disposing of mixed wastes. Waste storage bins should be placed on pavement whenever possible to prevent contamination of the underlying soil from pollutants, such as oil and grease that may be present on scrap metal. Overhead canopies will further reduce the potential for pollutant migration via stormwater runoff. Signs should be posted to identify the proper storage bin for a particular waste.

*Solid wastes should be segregated by type.*

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*If hazardous materials are stored outdoors, they should be stored under cover and secondary containment should be provided.*



*Absorbent debris saturated with used oil must be contained, managed, and disposed of as a hazardous waste.*



Solid wastes should be segregated by type:

- Street sweepings
- Asphalt, brick, and concrete (ABC waste) materials
- Brush and timber
- Demolition debris (lumber, shingles, wall board, insulation, etc.)
- Scrap metal, bare steel
- Scrap metal, aluminum
- Scrap metal, galvanized
- Tires

The facility grounds should be patrolled each day for litter and to identify oil or hazardous materials spills from such sources as leaking vehicles and equipment. Any stained soils or puddled oil should be cleaned up immediately, and the material should be disposed of as a hazardous waste. Leaking vehicles or equipment should be repaired immediately, or stored indoors with proper containment and collection of the leaking fluid, such as a drip pan or absorbent pads.

If hazardous materials are stored outdoors, they should be stored under cover and secondary containment should be provided to prevent a release of the material in the event that a container leaks or ruptures, and to prevent contact with stormwater. Secondary containment is mandatory for hazardous waste stored outdoors in above ground tanks. Secondary containment means a double-walled tank, or berming or lining trenches to contain spilled substances.

## Vehicle Maintenance Areas

The facility garage, as well as any other storage or operations buildings, should be kept clean and orderly at all times. Although it is common for some minor spillage of oil or other fluids to occur during vehicle or equipment repairs, the spilled product should be cleaned up immediately using absorbents. We recommend the use of drip pans to eliminate the need for absorbents. Absorbent debris saturated with used oil must be contained, managed, and disposed of as a hazardous waste. However, laundering and re-use of rags is preferential to disposal when possible. Note that soiled rags and wipers must be contained in self-closing, flame-proof canisters.

Garage floors should be swept daily, or as needed, to prevent oily absorbents, dirt and spilled fluids from entering floor drains, as well as to prevent slip/fall injuries. Trough-type floor drain systems should also be cleaned out daily, or as necessary, to prevent build-up of sediments within the trough. The trough is intended to provide a small degree of containment in the event of a spill, and will not function properly if filled with sediment.

Oil drain pans should be emptied into the facility waste oil storage receptacle immediately upon completion of the job to reduce the potential of accidental spillage.



New England

*All containers of hazardous materials must be kept properly closed and clearly labeled with their contents.*



*The hazardous waste accumulation area must be maintained as required by state and federal hazardous waste regulations. This includes:*

- *posting the area with a sign that reads "Hazardous Waste Storage Area"*
- *proper labeling of containers*
- *delineating the extent of the storage area(s)*
- *keeping all containers tightly closed except when adding or decanting from the container, and*
- *maintaining proper spacing between containers for inspection purposes.*

## Hazardous Materials Storage Areas

Whenever possible, oil and hazardous materials should be consolidated into a single storage area (or as few locations as practical) for ease in inspection, containment, and safety. The hazardous materials storage area should be as far away as possible from floor drains, lunch break areas and sole points of egress. National Fire Prevention Association (NFPA) or Underwriter's Laboratory (UL) certified Flammable Materials cabinets should be used for flammable materials in small containers. All containers of hazardous materials must be kept properly closed and clearly labeled with their contents.

The hazardous materials storage area should be kept neat and orderly, and the area should not be blocked in any way that might prevent proper access or egress. Hazardous materials should be put back into the storage area immediately after use. Avoid leaving containers on the work bench or floor, even if you believe they may be needed later that day, or the next day.

Bulk containers (drums) of oil or other fluids should be stored on spill containment pallets or self-contained drum cradles. Although not required for indoor storage, this secondary containment will greatly reduce the potential for a release of the material to the environment if the container spills, leaks or ruptures, and will minimize material spilled on the floor during decanting. Absorbent drum-top pads will help prevent spills during use. Be sure to replace the pads before they become saturated, and dispose of any saturated pads as a hazardous waste. Alternatively, some pads can be wrung-out and reused, and the used oil disposed of properly.

## Hazardous Waste Accumulation Areas

The facility hazardous waste accumulation area (and satellite accumulation areas) must be maintained as required by state and federal hazardous waste regulations. This includes:

- posting the area with a sign that reads "Hazardous Waste Storage Area" in one-inch lettering
- labeling containers with contents, accumulation start date
- delineating storage area boundaries
- keeping all containers tightly closed except when adding or decanting from the container, and
- maintaining proper spacing between containers for inspection purposes.

Spilled material must be cleaned up immediately. The accumulation area can not be blocked in any way that would prevent access by authorized personnel. As for unused oil and hazardous materials, secondary containment pallets or other means of containment should be provided to control spills. A drum top funnel which screws into the bung opening of a drum, and which has a latchable, tight sealing lid is recommended for decanting waste into containers, to minimize spillage, and for ease in repeat decanting. Note that if the drain funnel cannot be tightly closed to seal the drum, it must be removed after decanting the waste, and the bung must be placed tightly on the drum when not in use.

*To ensure that proper house-keeping practices are in place at your facility, it is recommended that a visual facility inspection be performed daily by the facility foreman, superintendent, or other person of authority.*

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*In addition to the daily inspection, a written inspection of the entire facility and grounds should be made, to identify potential areas of non-compliance with applicable regulations and policies.*

Do not store equipment, drain pans, or other tools in the hazardous waste accumulation area. Ensure that drain pans are thoroughly drained of free flowing oil, and store in a cabinet or secondary container separate from the hazardous waste accumulation area.

## Internal Facility Inspections

To ensure that proper house-keeping practices are in place at your facility, it is recommended that a visual facility inspection be performed daily by the facility foreman, superintendent, or other person of authority. Deficiencies should be corrected immediately, preferably by the responsible party. This will help break "old habits" that might be characteristic of certain personnel. Personnel should understand why it is important to maintain a general state of cleanliness at the facility. As facility conditions improve, so will the attitudes of the personnel, as they will learn to appreciate a cleaner work environment.

In addition to the daily inspection, a written inspection of the entire facility and grounds should be made, to identify potential areas of non-compliance with applicable regulations and policies. The written inspection report will allow facility managers to track progress in maintaining compliance, and will identify personnel training needs. Note that hazardous waste regulations require Small Quantity Generators (SQG) to do a daily inspection of short-term storage areas and maintain a log. Although not required of very small quantity generators (VSQG's), a periodic written inspection of the facility is recommended at least monthly.

## For More Information

Contact your state environmental agency or staff from EPA's New England Environmental Assistance Team listed below.

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